

# EXHIBIT 69

1 DEPOSITION OF LAURIE OLIVER

2 IN THE UNITED STATES DISTRICT COURT  
3 FOR THE DISTRICT OF DELAWARE

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4 THOMSON REUTERS ENTERPRISE  
5 CENTRE GMBH and WEST  
6 PUBLISHING CORPORATION,

7 Plaintiffs/  
8 Counterdefendants,

9 vs.

C.A. No.  
20-613-LPS

10 ROSS INTELLIGENCE INC.,

11 Defendant/  
12 Counterclaimant.

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13  
14 HIGHLY CONFIDENTIAL PURSUANT TO THE PROTECTIVE  
15 ORDER

16 VIDEOTAPED DEPOSITION OF LAURIE OLIVER

17 MINNEAPOLIS, MINNESOTA

18 March 30, 2022

19  
20  
21  
22  
23 Reported by:

24 KATHY L. STEWART

25 JOB NO. 208916

DEPOSITION OF LAURIE OLIVER

March 30, 2022

9:36 a.m.

Videotaped deposition of LAURIE OLIVER, held  
at the offices of Regus, 100 S. Fifth  
Street, Suite 1900, Minneapolis, Minnesota,  
before Kathy Stewart, a Notary Public of the  
State of Minnesota.

1 DEPOSITION OF LAURIE OLIVER

2 A P P E A R A N C E S:

3

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5

6 KIRKLAND & ELLIS

7 Attorneys for Plaintiff

8 601 Lexington Avenue

9 New York, New York 10022

10 BY: JOSHUA SIMMONS, ESQ.

11

12

13 CROWELL & MORING

14 3 Embarcadero Center

15 San Francisco, California 94111

16 BY: KAYVAN GHAFARI, ESQ.

17 DIANE AGUIRRE-DOMINGUEZ, ESQ.

18

19

20 ALSO PRESENT:

21 Jacob Arvold, Videographer

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## DEPOSITION OF LAURIE OLIVER

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DEPOSITION OF LAURIE OLIVER

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## 1 DEPOSITION OF LAURIE OLIVER

2 VIDEOGRAPHER: This is the start of  
3 media labeled number 1 of the video recorded  
4 deposition of Laurie Oliver in the matter  
5 Thomson Reuters Enterprise Centre GMBH,  
6 et al., vs. Ross Intelligence Inc. in the  
7 United States District Court for the  
8 District of Delaware, Case Number 20-613  
9 (LPS).

10 This deposition is being held at  
11 100 South Fifth Street, 19th floor,  
12 Minneapolis, Minnesota on March 30th, 2022.  
13 The time is approximately 9:36 a.m.

14 My name is Jacob Arvold. I am the  
15 legal video specialist from TSG Reporting,  
16 Inc., headquartered at 228 East 45th Street,  
17 Suite 810, New York, New York 10017.

18 The court reporter is Kathy Stewart  
19 in association with TSG Reporting.

20 Counsel, please introduce  
21 yourselves.

22 MR. GHAFFARI: My name is Kayvan  
23 Ghaffari from the law firm of Crowell &  
24 Moring, along with my colleague, Diane  
25 Aguirre-Domingu, on behalf of Defendant/



DEPOSITION OF LAURIE OLIVER

Counterplaintiff Ross Intelligence Inc.

MR. SIMMONS: My name is Joshua Simmons. With me is Jennifer Gibbins. We are both from Kirkland & Ellis. We are also joined by Jean-Pierre Giuliano from Thomson Reuters, in-house counsel, and we represent the Plaintiffs and the witness.

VIDEOGRAPHER: Will the court reporter please swear in the witness.

LAURIE OLIVER,  
called as a witness, was duly sworn and  
testified as follows:

EXAMINATION

BY MR. GHAFARI:

Q. Good morning, Ms. Oliver.

A. Good morning.

Q. How are you doing today?

A. I am good.

Q. Would you please state and spell your name for the record.

A. Laurie Oliver, L-A-U-R-I-E O-L-I-V-E-R.

Q. And would you please also state your

1 DEPOSITION OF LAURIE OLIVER

2 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

## DEPOSITION OF LAURIE OLIVER

STATE OF MINNESOTA

## CERTIFICATE

COUNTY OF RICE

I, Kathy Stewart, hereby certify that I reported the deposition of LAURIE OLIVER on the 30th day of March, 2022, and that the witness was by me first duly sworn to tell the truth and nothing but the truth concerning the matter in controversy aforesaid;

That I was then and there a Notary Public in and for the County of Rice, State of Minnesota; that by virtue thereof I was duly authorized to administer an oath;

That the foregoing transcript is a true and correct transcript of my stenographic notes in said matter, transcribed under my direction and control;

That the cost of the original has been charged to the party who noticed the deposition and that all parties who ordered copies have been charged at the same rate for such copies;

That the reading and signing of the deposition was not waived;

That I am not related to nor an employee of any of the attorneys or parties hereto, nor a relative or employee of any attorney employed by the parties hereto, nor financially interested in the outcome of the action and have no contract with parties, attorneys or persons with an interest in the action that affect or has a substantial tendency to affect my impartiality;

WITNESS MY HAND AND SEAL this 11th day of April, 2022.

*Kathy Stewart*

Kathy Stewart

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE CENTRE  
GMBH and WEST PUBLISHING  
CORPORATION,

C.A. No. 20-613-LPS

Plaintiffs, Counterdefendants,

v.

ROSS INTELLIGENCE INC.,

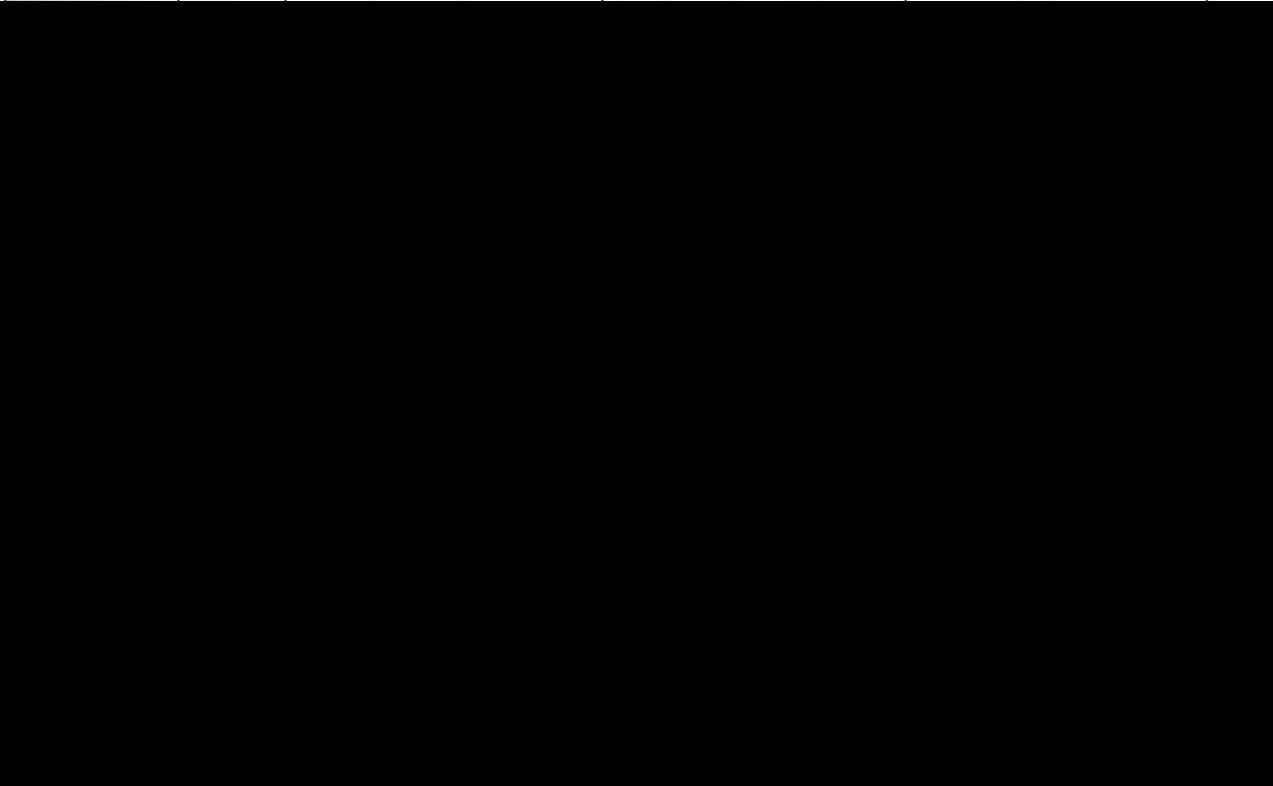
Defendant, Counterclaimant.

**PLAINTIFFS THOMSON REUTERS ENTERPRISE CENTER GMBH  
AND WEST PUBLISHING CORPORATION'S NOTICE OF ERRATA  
FOR THE DEPOSITION OF LAURIE OLIVER**

I, the undersigned, do hereby declare that I read the deposition transcript of Laurie Oliver dated March 30, 2022 and that to the best of my knowledge, said testimony is true and accurate, with the exception of the following changes listed below:

Page	Line	Original Text	Replacement Text	Reason

Page	Line	Original Text	Replacement Text	Reason
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Dated: May 4, 2022

Laurie Oliver  
Laurie Oliver